

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

ROBERT TROHA and FREDERICK BIGNALL)	
on behalf of themselves and all others)	
similarly situated,)	
)	
Plaintiff,)	
vs.)	
)	Civil Action No. 05-191-E
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

UNOPPOSED MOTION FOR AN EXTENSION OF TIME

Plaintiffs, Robert Troha and Frederick Bignall, for themselves and all others similarly situated, through counsel, move for an extension of time relating to Plaintiffs' identification of subclass representative and for the filing of dispositive motions. In support of their Motion, Plaintiffs aver:

1. On February 20, 2006, the Court certified this case as a class action pursuant to Rule 23. The Court certified an umbrella class and six subclasses.
2. Per the joint submission of the parties, the Court ordered that Plaintiffs attempt to identify and join at least one subclass representative for each subclass.
3. Plaintiffs' counsel has worked diligently to identify and join subclass representatives. At the present time, Plaintiffs have been able to identify and join at least one subclass representative for four of the six subclasses.
4. Plaintiffs believe that with some additional time to meet and confer with Class members, Plaintiffs will be able to identify and join subclass representatives for the two remaining

subclasses.

5. Plaintiffs seek an extension of time, until and including October 13, 2006, to identify and join additional subclass representatives.

6. As a result of the delay in joining subclass representatives, Plaintiffs also seek an extension of time, until and including, November 23, 2006, to file any dispositive motions on liability.

7. Defendant has proposed filing its opposition to Plaintiffs' dispositive motions no later than December 22, 2006.

8. Counsel for Defendant has stated that she does not oppose Plaintiffs' motion.

9. Plaintiffs submit the attached proposed order reflective of all dates to be extended.

Respectfully submitted,

s/David A. Cohen

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